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March 17, 2023

Via ECF

Hon. Judith C. McCarthy
Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse

Re: ***United States of America, ex rel. Integra Med Analytics LLC v. Isaac Laufer et al., No. 17-CV-9424 (CS) (JCM)***

Dear Judge McCarthy:

We represent Integra Med Analytics LLC, the relator in the above-captioned action. Relator commenced this action pursuant to the federal False Claims Act, 31 U.S.C. § 3729, et seq. Reference is made to the hearing before the Court held on March 15, 2023, regarding unresolved discovery issues.

At the hearing, Defendants argued that they are entitled to the names and identities of witnesses whom the government interviewed. In doing so, Defendants referenced Relator's disclosure of witnesses that it had interviewed before the government elected to intervene in the case. These witnesses were not interviewed by attorneys, or at the direction of attorneys. For that reason, relator did not assert that the witness names or the subject of the interviews, were protected by the work product doctrine.

I appreciate the opportunity to bring this perspective to the Court's attention.

Best Regards,

A handwritten signature in black ink that reads "Jeremy Wells".

Jeremy H. Wells, Partner
REID COLLINS & TSAI LLP